

## **WEIS MARKETS INC.**

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Sunbury, Pennsylvania 17801  
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April 30, 2003

The Honorable Ann Veneman  
Secretary, U.S. Department of Agriculture  
Country of Origin Labeling Program  
Agricultural Marketing Service  
Stop 0249 Room 2092-S  
1400 Independence Avenue, SW  
Washington, DC 20250-0249

**Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program**

Dear Secretary Veneman:

I am the Director of Produce Merchandising for Weis Markets, Inc., a Mid-Atlantic food retailer with 159 locations in six states, including Pennsylvania, Maryland, New Jersey, New York, Virginia and West Virginia. As such, I am very concerned about the country of origin labeling guidelines that you issued.

Our produce departments offer over 400 stock-keeping units (SKU) of fresh fruit and vegetables to consumers on a daily basis. Our produce is sourced from many countries throughout the world to ensure that consumers have high quality produce at an affordable year round. The task of identifying the country of origin as required by the law for all of these products is enormous and extremely difficult in a fast moving store environment. We cannot look at a bunch of grapes or a hand of bananas and identify the country of origin of the product. To avoid chaos, it is essential that you require our suppliers to provide us with that information and to implement systems – such as verifiable segregation plans – to ensure that the information that we receive is accurate and timely; we must be able to rely on the information that our suppliers provide.

As you develop the regulations, please consider the following:

- Hold suppliers who are responsible for fresh and frozen fruits and vegetables at the growing, packing and processing stages accountable for providing accurate information on the countries in which each stage of production occurs;
- Provide for flexible means of informing consumers of the country of origin of fresh and frozen produce at retail; and
- Implement reasonable record-keeping requirements.

Please issue regulations that will allow us to comply with the law without limiting our ability to continue to provide consumers with a fresh and abundant produce supply.

Sincerely,



Charlie Breneman  
Director of Produce Merchandising  
Weis Markets, Inc.